

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

TEXANS FOR ISRAEL, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE TREASURY,
et al.,

Defendants.

Civil Action No. 2:24-CV-00167-Z

CONSENT MOTION FOR LEAVE TO FILE BRIEF WITH EXTENDED PAGE LIMITS

Pursuant to Local Rules 7.2(c), Defendants move for this Court to extend Defendants' page limits for their forthcoming motion to dismiss Plaintiffs' complaint by 30 pages. Plaintiffs consent to this request. The ground for this request is set forth below.

1. Across six counts, Plaintiffs' Complaint challenges the President's authority to issue, and various agencies' enforcement of, Executive Order 14115, 89 Fed. Reg. 7605 (Feb. 1, 2024). The Complaint was filed on August 6, 2024. Defendants' current deadline to answer or otherwise respond to the complaint is October 15, 2024.
2. Defendants plan to file a motion to dismiss Plaintiffs' complaint by the October 15, 2024 deadline. Under Local Rule 7.2(c), Defendants' brief in support of their motion may not exceed 25 pages. Defendants request an additional 30 pages for their opening motion in order, for a total of 55 pages, to fully and adequately address several potential grounds for dismissal, including the threshold issues of standing. Plaintiffs include six individuals and entities, both foreign and domestic, and have brought suit against ten Defendants, including five agencies. Defendants believe the Court would benefit from a fuller discussion of the alleged injuries of each Plaintiff, and the redressability challenges of

several of Defendants. Additionally, Plaintiffs' complaint poses justiciability concerns under the political question doctrine, and each of the six counts fail to state a claim.

3. The number of parties, the number of claims, and the complexity of the issues constitute "extraordinary and compelling reasons" for such an extension.
4. Plaintiff consents to Defendants' request.

Dated: October 9, 2024

Respectfully submitted,

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Principal Deputy Assistant Attorney General

DIANE KELLEHER
Director

BRIGHAM J. BOWEN
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/s/ Dorothy Matilda Canevari
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2024, I electronically filed this s brief with the Clerk of the Court for the United States District Court for the Northern District of Texas by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Dorothy Matilda Canevari
DOROTHY M. CANEVARI
U.S. Department of Justice

CERTIFICATE OF CONFERENCE

I certify that on October 7, 2024, Defendants' counsel conferred with counsel for Plaintiffs regarding this motion pursuant to Local Civil Rule 7.1. Plaintiffs do not oppose Defendants' motion.

/s/ Dorothy Matilda Canevari
DOROTHY M. CANEVARI
U.S. Department of Justice